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WILDLIFE AND WILDLIFE HABITAT MITIGATION PLAN FOR THE THOMPSON FALLS HYDROELECTRIC PROJECT

Final Report

August 1985

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PREFACE

This document presents a preliminary mitigation and enhancement plan for the Thompson Falls hydroelectric project. It discusses options available to provide wildlife protection, mitigation and enhancement in accordance with the Pacific Northwest Electric Power Planning and Conservation Act of 1980 (P.L. 96-501). The options focus on mitigation for wildlife and wildlife habitat losses attributable to the construction of the hydroelectric project. These losses were previously estimated from the best available information concerning the degree of negative and positive impacts to target wildlife species (Wood and Olsen 1984).

Criteria by which the mitigation alternatives were evaluated were the same as those used to assess the impacts identified in the Phase I document (Wood and Olsen 1984). They were also evaluated according to feasibility and cost effectiveness.

This document specifically focuses on mitigation for target species which were identified during Phase I (Wood and Olsen 1984). It was assumed mitigation and enhancement for the many other target wildlife species impacted by the hydroelectric developments will occur as secondary benefits.

The recommended mitigation plan includes two recommended mitigation projects: 1) development of wildlife protection and enhancement plans for MPC lands and 2) strategies to protect several large islands upstream of the Thompson Falls reservoir. If implemented, these projects would provide satisfactory mitigation for wildlife losses associated with the Thompson Falls hydroelectric project.

The intent of the mitigation plan is to recommend wildlife management objectives and guidelines. The specific techniques, plans, methods and agreements would be developed is part of the implementation phase.

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I. INTRODUCTION

A. DESCRIPTION OF THE PROJECT AREA

Thompson Falls Dam near Thompson Falls, Montana is situated 69 miles upstream from Lake Pend Oreille located in Idaho. Construction on the power generation project began in 1913. The project consists of a 1,016 foot long and 54 foot high concrete main dam and a 449 foot long and 45 foot high concrete auxiliary dam. A 12-mile long reservoir with a surface area of 1,446 acres was formed. The Montana Power Company (MPC) acquired the project from the Thompson Falls Power Company in 1929 and continues to operate the dam. Prior to installation of radial gates in 1982, a seasonal drawdown of 14 feet occurred in spring. Current operation of the project is run-of-the-river, with 2 foot fluctuations expected. However, drawdowns up to 14 feet could occur for maintenance and inspection. These major drawdowns are expected to be infrequent (O'Neil 1985, pers. commun.).

The lower Clark Fork River flows in a northwestern direction to Lake Pend Oreille, Idaho. The topography was greatly influenced by the massive glacial Lake Missoula (Tilton 1977) as evidenced by the typically narrow, U-shaped river valley. The valley floor at 2,400 feet is bounded by steep mountains rising to over 5,900 feet. The Cabinet Mountains border on the north and the Coeur d'Alene Mountains lie to the south of the river. Chief tributaries are the Thompson, Vermilion and Bull Rivers.

The floristic composition reflects the mild Pacific maritime climate influence. Red cedar (Thuja plicata) and hemlock (Tsuga heterophylla) dominate the western most section of the lower Clark Fork River area as well as the stream bottoms. Dense forests of douglas fir (Pseudotsuga menziesii), lodgepole pine (Pinus contorta), western larch (Larix occidentalis), and ponderosa pine (Pinus ponderosa) occupy the benches and slopes above the river. Broadleaf trees and shrubs are found as narrow strips along the river and stream bottoms. A mosaic of conifers and hardwoods lie in between. Cultivated areas of small grains and hay are scattered throughout the valley floor.

Abundant and diverse wildlife populations inhabit the area. Big game species such as elk (Cervus elaphus), white-tailed deer (Odocoileus virginianus) and mule deer (O. hemionus) are common in the timbered mountains and bottomlands. Bald eagles (Haliaeetus leucocephalus) and osprey (Pandion haliaetus) are found along the waterways. Other big game species, upland game birds, waterfowl, furbearers and raptors occupy the area.

For the purpose of this report, the reservoir is defined to include the impoundment area between the Thompson Falls Dam and the mouth of the Thompson River, a distance of six river miles (Figure 1). Although the Federal Energy Regulatory Commission licensing document describes the reservoir boundary as occurring 12

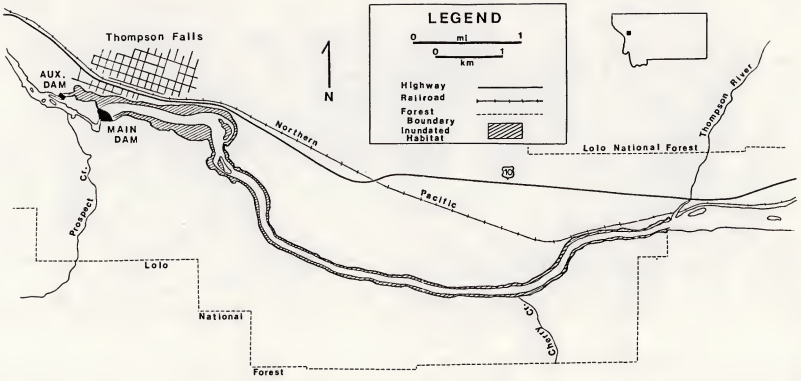

Fig. 1. The estimated wildlife habitat acreage inundated (347 acres) within the 6-mile impact area if the the Thompson Falls Reservoir.

miles upstream from the dam, it was agreed by entities participating in the development of this report that little or no impact to wildlife at present can be attributable to the reservoir within the upper six miles.

B. IMPACT ASSESSMENT

The Northwest Power Planning Council, pursuant to the Northwest Power Act of 1980 (PL 96-501), adopted the Columbia River Basin Fish and Wildlife Program. This Program, with funding support from the Bonneville Power Administration (BPA), directed states or other entities to assess from existing data the probable wildlife and wildlife habitat losses at hydroelectric projects in the Columbia River Basin. Following this assessment, the program required the development of mitigation status reports and mitigation and enhancement plans for specific projects.

In response to the Fish and Wildlife Program, an assessment of wildlife impacts and summary of previous mitigation related to Thompson Falls Dam was developed to identify significant target species impacts. (Wood and Olsen 1984:8). Acreages of 6 habitat types inundated by the reservoir were estimated using aerial photographs and relative abundances of habitat types present in other portions of the Clark Fork River (Table 1). For each target species, the area of critical habitat impacted by the project was determined. From this information, qualitative and quantitative loss estimates or benefits were made (Table 2)(Wood and Olsen 1984:41).

These impact estimates (and benefits) provide the basis for quantified objectives to be accomplished through a preliminary mitigation and enhancement plan for the Thompson Falls project. No previous wildlife mitigative measures have been documented for the Thompson Falls Dam.

Table 1. Habitat loss estimates for Thompson Falls dam

Habitat Type	% inundated[a/]	Acres (mean)
Grassland/hay meadow	15.0	52
Shrub	13.5	47
Mixed conifer	71.5	248
Total	100.0	347

a/ Percentages based on mean relative percent of habitats inundated by Cabinet Gorge and Noxon Rapids dams on lower Clark Fork River, Montana (Wood and Olsen 1984:8)

Table 2. Impact assessments for selected target species - the Thompson Falls Dam.

Species/ Species group	Major Impacts	Quantitative Estimate
White-tailed deer	Loss of winter range	21-47 white-tailed deer
Mule deer	Loss of spring range	41-64 acres
Elk	Negligible losses	No quantitative estimate determined
Bear	Loss of spring and summer forage areas	41-64 acres grass/hay meadows 42-54 acres shrub steppe
Mountain lion	Loss of prey species	21-47 white-tailed deer 41-64 acres of spring range for mule deer
Bobcat	Loss of prey species	not quantifiable
River otter	Loss of foraging, denning and vesting sites	2-4 otters
Beaver	Loss of optimal habitat	1-3 colonies
Bald eagle	Loss of winter food resource	2-3 eagles
Osprey	Increase in nesting	1-2 active nest sites
Ruffed grouse	Loss of yearlong habitat	28-54 ruffed grouse
Waterfowl	Loss of nesting and and brood-rearing sites; creation of brood-rearing sites and increased open water areas	Negative impacts balanced by positive impacts and mitigation efforts

II. METHODS

A. MITIGATION OBJECTIVES

The Phase I document for the Thompson Falls hydroelectric project (Wood and Olsen 1984) contained: 1) an analysis of the habitats inundated by the reservoir; 2) an assessment of the impacts to selected target wildlife species; and 3) a summary of previous mitigation of the impacts to the target species. Because no previous mitigation of the impacts resulting from the construction of the Thompson Falls facility has been accomplished, the impacts identified in the Phase I document (Wood and Olsen 1984) have been converted to mitigation goals (Table 2).

B. DEVELOPMENT OF MITIGATION PROJECT ALTERNATIVES

Alternative projects were evaluated for inclusion in the mitigation plan. Criteria considered in this evaluation included:

1) Responsiveness to comments received during interagency coordination;

2) Benefits to the primary target species;

3) Number of target species benefitted;

4) Benefits to non-target species;

5) Feasibility and cost effectiveness;

6) Consistency with the Fish and Wildlife Program;

7) Consistency with the Montana Department of Fish, Wildlife and Parks draft mitigation policy (Appendix A); and

8) Consistency with the Montana Department of Fish, Wildlife and Parks long range planning process.

Accordingly, mitigation alternatives were selected which: 1) provided opportunities to simultaneously benefit several target species; 2) accomplished mitigation in as close proximity as possible to the Thompson Falls project area; and 3) emphasized the development of long-term wildlife management agreements with other entities such as MPC or the Montana Department of State Lands.

III. RESULTS

A. INTRODUCTION

Two alternative opportunities for wildlife mitigation were identified which would achieve satisfactory wildlife mitigation at Thompson Falls: 1) the development of wildlife mitigation projects on suitable MPC lands and 2) the protection or enhancement of high quality wildlife habitats on other lands within the project area. The resulting mitigation plan is comprised of a combination of these 2 alternatives.

B. PROTECTION AND ENHANCEMENT OF MPC LANDS

1) Description

According to Sander's County plat records, MPC owns approximately 300 acres in the vicinity of the Thompson Falls Dam and reservoir. In addition, Washington Water Power Company owns 20 to 30 acres of land along the Clark Fork River just below Thompson Falls Dam. Approximately 60 ac of MPC's 300 acres surrounds the power house, associated facilities, roads, powerlines, and the town of Thompson Falls (Figure 2). The developed portions of MPC's lands are not considered suitable for long-term wildlife management. Approximately 80 acres north of the river and another 140 acres south of the river of MPC lands contain forested Ponderosa Pine/Douglas-fir habitats used by white-tailed deer in winter. However, these lands are surrounded by existing or planned subdivisions and the town of Thompson Falls (Figure 2). Because of the close proximity of human developments to MPC's lands, the potential benefits for managing these lands for white-tailed deer winter range have been reduced.

The estimated remaining 25 acres of MPC's lands consist of strip or border lands, several islands, and a peninsula. Without a land survey being undertaken, it is difficult to determine the status of MPC's strip lands (inundated, eroded, etc.). Where sufficient shoreline tracts remain, the potential exists to protect these areas for aquatic furbearers, bald eagle and osprey use. An estimated 3-5 acres of strip lands are shown in the Sander's County files.

The islands owned by MPC have been described in MPC's Canada Goose report (O'Neil 1984). A total of 67 goose nests were located on all 3 islands during the 3-year MPC study with most nesting occurring on Steamboat Island. According to MPC's report no nests were located along shoreline areas.

Prior to the addition of radial gates to the dam in 1982, reservoir drawdowns in the spring exposed mud flats which were used as goose brood-rearing areas. The installation of radial gates, however, has caused this brood-rearing area to be inundated during

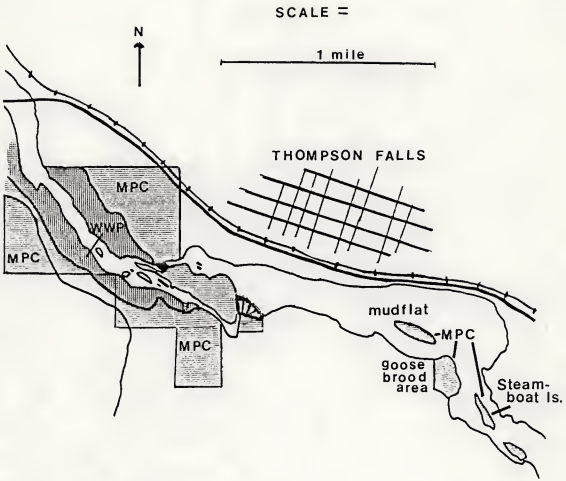

Fig. 2. MPC and Washington Water Power (WWP) lands near Thompson Falls Dam.

spring and early summer. The impact of this loss of brood-rearing habitat has been significant. Fewer broods have been seen on the reservoir and many have been found foraging in close proximity to town (O'Neil 1984). To meet the Federal Energy Regulatory Commission stipulations for the radial gate addition MPC created a 5 acre brood-rearing area on a portion of their 15 acre tract located near Steamboat Island (Figure 2). Evidence of broods using the clearing was documented in 1984 (O'Neil 1984).

The remaining lands owned by MPC consist of a smaller (2-3 ac) "peninsula" which becomes an island at full pool because of the radial gate installations. This area lies just southeast of Steamboat Island (Figure 2).

2) Recommended Management

Development of long-term wildlife management agreements on most of MPC's lands could accomplish a significant portion of wildlife mitigation. To mitigate the loss of white-tailed deer habitat, it is recommended a cooperative management agreement between MPC and the Montana Department of Fish, Wildlife and Parks be developed on approximately 140-160 acres of lands south of the Clark Fork River. The management agreement should exist for the life of the Thompson Falls hydroelectric project. Primary emphasis in the agreement should be for wildlife, particularly white-tailed deer winter range enhancement and management. The plan might include timber harvest strategies which would maintain or enhance deer winter forage and cover requirements. It should also address other land uses such as recreation or grazing which could conflict with deer (or other wildlife) benefits. In addition, possibilities to acquire similar protection and management strategies on adjacent undeveloped lands, particularly all of Washington Water Power's lands below Thompson Falls Dam (Figure 2) and undeveloped private lands bordering MPC lands should be pursued. This would help protect the integrity of winter range on MPC's land as well as protect perching habitat for bald eagle and osprey or shoreline habitat for aquatic furbearers for lands along the river.

MPC's lands north of the river could be included in the management agreement primarily to serve as a buffer between the town of Thompson Falls and the lands to the south. Protection of these lands would also benefit non-game wildlife species.

For mitigation of waterfowl losses, it is recommended that a wildlife management agreement with the Department be developed for the 3 islands and 2 peninsula areas. This agreement would also be created for the life of the hydroelectric project. The objective of the agreement would be long-term protection and enhancement of waterfowl nesting and brood-rearing habitat on MPC lands. The plan would address control of access and recreational activities during nesting and brood-rearing seasons. It should also describe methods to develop and/or maintain nesting structures and brood-rearing

habitats over time. The management agreement would compliment MPC's current Canada goose research and management efforts on the reservoir.

For MPC's strip lands, it may be possible to protect or enhance habitats for aquatic furbearers, bald eagle, osprey or waterfowl. An assessment of the status of these lands (i.e. inundated, leased, etc) would be required first. A management plan for strip lands might include protecting snags and large-diameter trees, limiting grazing and other activities, and enhancing brood-rearing habitat.

3) Mitigation Accounting

Credit would be given for those lands protected and managed for white-tailed deer and/or waterfowl or other target species. Because of the proximity of human developments to MPC's timbered tracts south of the Clark Fork, full credit on an acre-for-acre basis would not be recommended. Rather, credit would be applied in a 2:1 or 3:1 ratio depending on the outcome of site-specific plans. No credit would be applied for MPC's lands north of the Clark Fork because of existing human encroachment. For Washington Water Power lands on both sides of the river full acre-for-acre credit would be applied because of the importance of protected riparian habitats to bald eagle, osprey, aquatic furbearer and waterfowl. For MPC's 3 island and 2 peninsula areas mitigation credit would be applied on an acre-for-acre basis because of their high values for waterfowl.

Credits for strip lands cannot be determined until more information is gathered. Where suitable habitats can be protected or enhanced credit would be given for aquatic furbearers, bald eagle, osprey or waterfowl on an acre-for-acre basis.

Based on this accounting system, a maximum of 115 to 125 acres of wildlife mitigation credit could result as follows: 70-80 acres for lands south of the river; 20 acres for Washington Water Power lands, and 25 acres for islands, peninsula and strip lands.

4) Species Benefitted

Management of MPC's lands for wildlife should benefit many target wildlife species such as white-tailed deer, ruffed grouse, bald eagle, osprey, terrestrial furbearers and aquatic furbearers. Many non-target species would also be benefitted.

C. CLARK FORK ISLANDS

1) Description

A large island complex is located approximately 7 miles upstream of Thompson Falls dam. This complex consists of 4 large islands, several smaller ones, and associated gravel bars (Figure 3). Dominant vegetation of the larger islands includes old-growth cottonwood forest, mixed conifer/deciduous forest, shrublands and open meadows. A natural gas pipeline and 2 large electrical transmission lines bisect 2 of the larger islands. Smaller island vegetation consists of shrub and grass/forb cover types.

North of the islands on the river shoreline, exists a 35 acre tract of Forest Service land. This tract contains a backwater slough, mixed deciduous/coniferous forests, shrublands and some upland habitat.

Of the approximate 325-acre island-shoreline complex, 72% is owned or managed by the Montana Department of State Lands (91 acres) and the U.S. Forest Service (148 acres)(Figure 3). The remaining property (86 acres) is privately owned.

The U.S. Forest Service, Lolo National Forest, presently has allocated their land on the island complex to a roadless area classification (management area 11). Management directions for this allocation include dispersed recreation and old-growth management both of which are compatible with long-term wildlife management. This allocation precludes timber management and developed recreation sites. Grazing, on a controlled basis, could be allowed.

The U.S. Forest Service tract located north of the river is allocated to big game management (Management area 19). The goals of this allocation are to optimize big game winter range and provide dispersed recreation.

Although the Department of State Lands manages their lands for income to the School Trust Fund, they currently are not obtaining income from management on the island complex. The Department of State Lands is currently interested in exchanging their ownership on the lands to the Forest Service for other Forest lands (J. Deibert 1985, pers. commun.).

2) Recommended Management

To complete wildlife mitigation for construction of the Thompson Falls reservoir, it is recommended that this island complex and associated wetlands be protected for the life of the Thompson Falls hydroelectric project. This could be accomplished through the development of a cooperative wildlife management

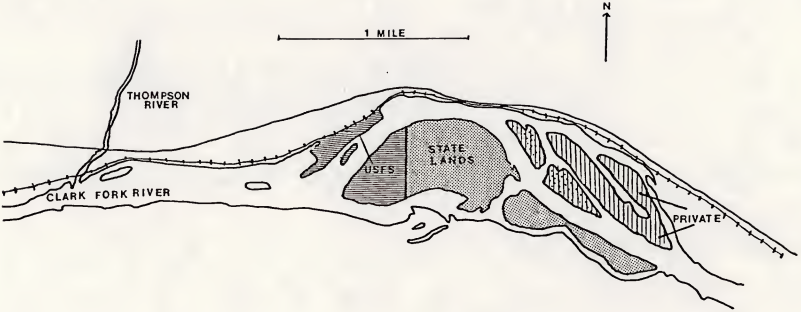

Fig. 3. Ownerhip of the Large Island Complex in the Clark Fork River upstream of Thompson Falls Dam.

agreement between the Montana Department of Fish, Wildlife and Parks, MPC, the U.S. Forest Service, and the Department of State Lands. Obtaining an agreement with the Department of State Lands may require contributions to the School Trust Fund or a land exchange. The remaining private lands could be protected via a conservation easement, land trade or fee-title acquisition. The management agreement would need to recognize the right-of-way maintenance requirements for the pipeline and transmission lines crossing the island complex and adjacent lands.

The purpose of the cooperative agreements and conservation easements would be to protect the current wildlife values of the islands. In addition, recreational, grazing and other uses could be controlled to insure wildlife benefits.

3) Mitigation Accounting

For private lands or state lands protected via long-term management agreements or conservation easements, full credit would be applied on an acre-for-acre basis. Because the Forest Service intends to manage their portion of the islands for purposes consistent with long-term wildlife, management objective mitigation credit for their lands included in a management agreement would not be necessary.

4) Species Benefitted

Implementation of this recommended project would benefit every target species impacted by the Thompson Falls project. This would include white-tailed deer, mule deer, elk, black bear, mountain lion, aquatic furbearers, bobcat, bald eagle, osprey, ruffed grouse and waterfowl. This project would also benefit many non-target species.

IV. SUMMARY

Two wildlife mitigation projects for the Thompson Falls hydroelectric project are recommended. These projects were selected using criteria established by the Montana Department of Fish, Wildlife and Parks (Appendix A). Coordination took place with the U.S. Forest Service and the U.S. Fish and Wildlife Service. However MPC withdrew from the mitigation planning phase.

Selected projects optimize mitigation opportunities on MPC lands and nearby U.S. Forest Service and School Trust lands. The 2 projects also are considered the most cost-effective of other alternatives.

The first mitigation project encompasses development of long-term management plans for all of MPC's lands (and 20-30 acres of Washington Water Power lands) in the area of Thompson Falls dam. Approximately 125 acres of mitigation credit are recommended for this project. The purpose of the management plans would be to protect and/or enhance white-tailed deer winter range; waterfowl nesting and brood-rearing habitat; and aquatic furbearer and bald eagle/osprey shoreline habitats.

The second recommended project entails protecting high quality riparian habitat on a large island complex located approximately 7 miles upstream of Thompson Falls dam. These islands contain old-growth cottonwood forests, mixed forests, meadows, gravel bars and shrubby vegetation and support nearly every target species impacted by construction of the dam. Protection would require developing cooperative management agreements and/or obtaining conservation easements with the U.S. Forest Service (148 acres), Montana Department of State Lands (91 acres) and one private land owner (86 acres).

Completion of these 2 mitigation projects would accomplish satisfactory mitigation for wildlife losses associated with the Thompson Falls hydroelectric facility. The estimated 292 to 312 acres of mitigation credit (Table 3) would satisfy the estimated net loss of 347 acres of wildlife habitats lost.

Table 3. Mitigation crediting for recommended wildlife projects, Thompson Falls Dam.

Project	Credits (acres)
1) MPC and Adjoining Lands	
- Management, protection of MPC lands near Thompson Falls Dam	70 - 80
- Protection and enhancement of MPC islands, peninsulas, strip lands	25
- Management Agreement on WWP lands	20 - 30
2) Large Islands Complex	
- Management Agreement on U.S. Forest Service Lands	0[a]
- Management Agreement on State School Trust Land	91
- Conservation Easement on private lands	86
Total	292 - 312

[a] These lands are currently allocated to wildlife management by the U.S. Forest Service.

V. LITERATURE CITED

O'Neil, T. 1984. Canada goose productivity 1982, 1983, and 1984, Thompson Falls, Montana. The Montana Power Company, Butte, Montana.

Tilton, M.E. 1977. Habitat selection and use by bighorn sheep (Oris canadensis) on a northwestern Montana winter range. Unpubl. Master's thesis, Univ. Montana, Missoula. 121 pp.

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APPENDIX A

May 31, 1983

MONTANA DEPARTMENT OF FISH, WILDLIFE, AND PARKS

MITIGATION GUIDELINES

RECEIVED
JUN 6 1983
REGION 1

When mitigation as provided by law is proposed for development projects, the Montana Department of Fish, Wildlife, and Parks shall request funding from the developer, or the appropriate agency, to conduct those studies necessary to determine impacts of the development on fish and wildlife and their habitat and to develop a project specific mitigation plan.

WILDLIFE SECTION

The principle objective of the mitigation plan shall be to mitigate within the project area impacts to wildlife and to compensate for animal losses attributable to the development project. The plan shall identify measures to maintain populations of affected species. The plan shall prescribe appropriate measures to document the implementation of the mitigation package, to monitor wildlife response to those measures, and to document the sufficiency of mitigation.

The Montana Department of Fish, Wildlife, and Parks shall request funding from the developer, or the appropriate agency, to implement, monitor, and document the mitigation measures prescribed in the mitigation plan.

Selection of mitigation measures for terrestrial species shall be determined by the following criteria:

A. The mitigation objective shall be to replace, on an animal for animal basis, animal losses attributable to the development project and to ensure the replacement of lost animal production into the future. This objective may be modified according to this priority:

   1. To replace, on an animal for animal basis, animal losses specifically attributable to the development project.

   2. To replace, on an animal for animal basis, some of the animal losses and an appropriate equivalent of animals of other species.

   3. To replace, on an animal for animal basis, an appropriate equivalent of other species.

B. Mitigation measures:

   1. The highest priority shall be assigned to the development and implementation of measures to enhance wildlife habitat on land owned by other agencies, corporations, or individuals, without the Department acquiring management authority to those lands.

      Implementation of enhancement measures shall be dependent upon cooperative agreements with the appropriate land management agencies and a land allocation compatible with mitigation objectives. The Department shall request funding for implementation of those measures, including operation and maintenance for

the life of the development project, and, when appropriate, research and development of enhancement measures.

2. If the Department cannot negotiate agreements to implement enhancement measures on lands in other ownership within a reasonable time, then the Department shall attempt to acquire management authority over lands identified in the mitigation plan. Acquisition of management authority by conservation easement, when applicable, shall have priority over acquisition by fee title from willing sellers. Lands to be acquired shall be determined by priorities established by this policy, while procedures for acquisition shall be consistent with principles outlined in the Department's statewide habitat acquisition policy. The Department shall develop a management plan for acquired lands. The Department shall request the developer, or the appropriate agency, to acquire the lands and to provide funding for development of the management plan, research and development appropriate to the management of those lands, and ongoing operation and maintenance of those lands.

3. On new projects, the Department shall request that mitigation lands be acquired at the same time as other project lands and be included in basic project costs.

C. The location of mitigation projects shall be consistent with the mitigation objectives, and be determined according to the following priority:

1. Immediate vicinity of the development project or within the annaul range of the species affected.

2. Within the county (or within a 50-mile radius) of the development project.

3. Within the corresponding Department of Fish, Wildlife, and Parks administrative region.

4. Within Montana.

D. Mitigation measures shall feature those species identified in Section A-1, 2 or 3, consistent with the mitigation objective. Those species shall have priority at all projects within location priorities Section C-1, 2, and 3. Thereafter, features species shall be determined by SCORP.

Decisions regarding acceptance or rejection of proposed mitigation recommendations shall be made with full public knowledge, input, and review.

Approved by:_____

Date:_____

APPENDIX B

United States Department of Agriculture
Forest Service
Plains/Thompson Falls Ranger District
P.O. Box 429
Plains, Montana 59859

REPLY TO: 1920 Resource Mgmt. Planning (2620)

DATE: June 13, 1985

RECEIVED
JUN 18 1985
FISH & GAME OFFICE

SUBJECT: Thompson Falls Hydroelectric Facility
Wildlife Mitigation Plan

TO: Director, Montana Dept.Fish, Wildlife & Parks

Thank you for the opportunity to comment on your Thompson Falls Hydroelectric Facility Wildlife Mitigation Plan.

As identified in the plan the Lolo National Forests role would be limited to the area identified on page 12, Section C "Clark Fork Islands." Not mentioned in the plan are the existence of a natural gas pipeline and several electrical transmission lines that bisect two of the islands. Maintenance of those lines will require periodic vegetative manipulation within the rights-of-way corridors. This should be recognized and addressed in the document as it will affect any cooperative agreement initiated between the Forest Service and the State for management of this area.

A small, but significant piece of National Forest riparian habitat that was not included in the narrative or on Figure 3 of the plan is located on the north side of the Clark Fork River in Section 17 opposite the "Big Island." This piece of land contains all the desirable riparian elements identified in table 1 plus gravel and sand bars and a small, back water slough. This area could make a significant contribution for wildlife and is allocated to big game winter range (MA-19) in the Forest Plan. The goals of this allocation are to 1) optimize big game winter range, and 2) provide dispersed recreation opportunities. Prescribed burning will be the primary managment tool used to achieve winter range objectives if such activity is needed.

The mitigation proposal put forth in your plan appear to be within the intent of the allocations given to these National Forest lands in the Forest Plan.

Lolo Forest personnel will be available to discuss implementation of this plan if it is approved.

Charles W. Spoon
for ORVILLE L. DANIELS
Forest Supervisor